

EXHIBIT E

IN RE: CAPITAL ONE CONSUMER DATA SECURITY BREACH LITIGATION
Confidential Steve Schuster 30(b)(6) on 06/11/2020

1 CONFIDENTIAL
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF VIRGINIA
4 ALEXANDRIA DIVISION
5
6 IN RE: CAPITAL ONE :
7 CONSUMER DATA SECURITY : MDL NO.:
8 BREACH LITIGATION : 1:19md2915 (AJT/JFA)
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14 VIDEOTAPED 30(b)(6) DEPOSITION OF
15 STEVE SCHUSTER
16 CONDUCTED REMOTELY
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19 9:35 a.m. EST
20 Thursday, the 11th day of June 2020
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1 APPEARANCES OF COUNSEL VIA VIDEOCONFERENCE

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1 APPEARANCES OF COUNSEL (CONTINUED)

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10 Also Present:
11 James Downie, videographer
12 Jennifer Cabezas, paralegal

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[REDACTED]

14 Q. You -- you mentioned GuardDuty as a -- an
15 AWS product or service. What is the function of
16 GuardDuty?

17 A. GuardDuty works like an -- a network
18 intrusion detection system or a post-intrusion
19 detection system. And what GuardDuty does is it
20 monitors behaviors in an account or behaviors on an
21 instance that may be indicative of a security concern
22 and raises an alarm to the customer that they may want
23 to investigate this type of behavior.

[REDACTED]

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A horizontal bar chart consisting of 25 black bars of varying lengths. The bars are arranged vertically, with the longest bar in the 10th position from the top and the shortest bar in the 12th position. The lengths of the bars represent a quantitative scale, with the 10th bar being the maximum and the 12th bar being the minimum.

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[REDACTED]

1 Q. And was this Version 2 of the instance
2 metadata service created to address what had happened
3 to Capital One in the data breach?

4 A. It was to -- it was created to include
5 additional controls, additional security that could be
6 available for that service. This particular one would
7 not have prevented -- even if implemented would not
8 have prevented the Capital One issue.

9 Q. But my question was: Was this version of
10 the instance metadata service created in whole or in
11 part because of what had happened to Capital One in
12 the data breach?

[REDACTED]

25 Q. Version 2 of the instance metadata service

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800-333-2082

1 DISCLOSURE

2

3 Pursuant to Article 10.B of the Rules
4 and Regulations of the Board of Court
5 Reporting of the Judicial Council of
6 Georgia which states: "Each court reporter
7 shall tender a disclosure form at the time
8 of the taking of the deposition stating the
9 arrangements made for the reporting
10 services of the certified court reporter,
11 by the certified court reporter, the court
12 reporter's employer or the referral source
13 for the deposition, with any party to the
14 litigation, counsel to the parties, or
15 other entity. Such form shall be attached
16 to the deposition transcript," I make the
17 following disclosure:

18

19 I am a Georgia Certified Court
20 Reporter. I am here as a representative of
21 Huseby Global Litigation. Huseby Global
22 Litigation was contacted to provide court
23 reporting services for the deposition.
24 Huseby Global Litigation will not be taking
25 this deposition under any contract that is
prohibited by O.C.G.A. 9-11-28(c).

Huseby Global Litigation has no
contract/agreement to provide reporting
services with any party to the case, any
counsel in the case, or any reporter or
reporting agency from whom a referral might
have been made to cover this deposition.

18

Huseby Global Litigation will charge
its usual and customary rates to all
parties in the case, and a financial
discount will not be given to any party to
this litigation.

21



22

Blanche J. Dugas
CCR No. B-2290

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1 STATE OF GEORGIA:

2 COUNTY OF FULTON:

3

4 I hereby certify that the foregoing
5 transcript was reported, as stated in the
6 caption, and the questions and answers
7 thereto were reduced to typewriting under
8 my direction; that the foregoing pages
9 represent a true, complete, and correct
10 transcript of the evidence given upon said
11 hearing, and I further certify that I am
12 not of kin or counsel to the parties in the
13 case; am not in the employ of counsel for
14 any of said parties; nor am I in any way
15 interested in the result of said case.

16

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BLANCHE J. DUGAS, CCR-B-2290

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DATE OF DEPOSITION: June 11, 2020

Dated: July 29, 2020